

Edward S. Renwick (SBN 29325)
erenwick@hanmor.com

HANNA AND MORTON LLP
444 South Flower Street, Suite 2530
Los Angeles, CA 90071-2916
Telephone: (213) 628-7516
Facsimile: (213) 623-3379

*Attorney for Creditors, Goodwin "A" Mineral Owners Group,
a California Unincorporated Association;
Waldo A. Gillette, Jr.; Presson Vera OC Land
Group a California Unincorporated Association;
and Sylvia and Frank Boisseanc.*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
NORTHERN DIVISION**

In re:

HVI CAT CANYON, INC.,

Debtor.

Case No. 9:19-bk-11573-MB
(Chapter 11)

**COMMENTS BY GOODWIN "A"
MINERAL OWNERS GROUP; WALDO
A. GILLETTE, JR.; PRESSON VERA
OC LAND GROUP AND SYLVIA AND
FRANK BOISSERANC ON TRUSTEES
PROPOSED SALE**

Date: October 5, 2020
Time: 10:00 a.m.
Dept: 1415 State Street, Ctrm 201
Santa Barbara, CA 93101
Judge: Martin R. Barash

TO THE HON. MARTIN R BARASH, UNITED STATES BANKRUPTCY JUDGE,
AND ALL INTERESTED PARTIES: CREDITIORS GOODWIN "A" MINERAL OWNERS

1 GROUP; WALDO A. GILLETTE, JR.; PRESSON VERA OC LAND GROUP; AND SYLVIA
2 AND FRANK BOISSERANC HEREBY COMMENT ON THE TRUSTEE'S NOTICE OF
3 PROPOSED SALE, BIDDING PROCEDURES, AUCTION, AND SALE HEARING

4
5 **INTRODUCTION**

6 Late in the day on Friday September 18, 2020, Counsel for the subject creditors was
7 advised via telephone there had been no up-bid on the assets located in the Santa Maria area and
8 the California Central Valley but that there had been a bid on REDU submitted by West Energy
9 Operating LLC. Two of the subject creditors have interests in REDU but know little or nothing
10 of the financial condition or operational abilities of the bidder. The deadline for objecting to the
11 sale is Monday September 21, 2020.

12 **ARGUMENT**

13
14 The subject creditors have no objection to the sale or the stalking horse bidder for the
15 Santa Maria area assets and the Central Valley assets. The subject creditors have long since
16 approved of the stalking horse bidder. The subject creditors do object to the sale of REDU for
17 the sole reason that they have been given no information whatsoever upon which to form an
18 opinion as to whether the REDU bidder is a responsible operator and insufficient time to vet the
19 REDU bidder.

20 //

21
22 //

23
24 //

CONCLUSION

We respectfully submit that the Court give the subject creditors additional time to vet the REDU bidder and supplement this response.

Dated: September 21, 2020,

Respectfully submitted,
Edward S. Renwick
Hanna and Morton LLP.

By: 

Edward S. Renwick
Attorney for the Goodwin "A" Mineral
Owners Group; Waldo A. Gillette, Jr.; Presson
Vera OC Land Group; and Sylvia and Frank
Boisseranc

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Hanna and Morton LLP
444 S. Flower Street, Suite 2530
Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled:

**COMMENTS BY GOODWIN "A" MINERAL OWNERS GROUP; WALDO A. GILLETTE, JR.; PRESSON VERA OC
LAND GROUP AND SYLVIA AND FRANK BOISSERANC ON TRUSTEES PROPOSED SALE**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* **September 21, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Anthony A Austin anthony.austin@doj.ca.gov
- William C Beall will@beallandburkhardt.com, carissa@beallandburkhardt.com
- Bradley D Blakeley blakeley@blakeleylawgroup.com, bradleydblakeley@gmail.com
- Alicia Clough aclough@loeb.com, mnielson@loeb.com, ladocket@loeb.com
- Marc S Cohen mscohen@loeb.com, klyles@loeb.com
- Alan D Condren , berickson@seedmackall.com
- Alan D Condren acondren@seedmackall.com, berickson@seedmackall.com
- Alec S DiMario alec.dimario@mhllp.com, debra.blondheim@mhllp.com; Syreeta.shoals@mhllp.com
- Jeremy Faith Jeremy@MarguliesFaithlaw.com,
Helen@MarguliesFaithlaw.com; Angela@MarguliesFaithlaw.com; Vicky@MarguliesFaithlaw.com
- Karl J Fingerhood karl.fingerhood@usdoj.gov, efile_ees.enrd@usdoj.gov
- H Alexander Fisch Alex.Fisch@doj.ca.gov
- Don Fisher dfisher@ptwww.com, tblack@ptwww.com
- Brian D Fittipaldi brian.fittipaldi@usdoj.gov
- Ellen A Friedman efriedman@friedmanspring.com, khollander@friedmanspring.com
- Gisele M Goetz gmgoezt@hbsb.com, ggoetz@collegesoflaw.edu; cecilia@hbsb.com
- Karen L Grant kgrant@silcom.com
- Ira S Greene Ira.Greene@lockelord.com
- Matthew C. Heyn Matthew.Heyn@doj.ca.gov, mcheyn@outlook.com
- Brian L Holman b.holman@mpglaw.com
- Brian L Holman b.holman@musicpeeler.com
- Tracy K Hunckler thunckler@daycartermurphy.com, cgori@daycartermurphy.com
- Samantha Indelicato sindelicato@omm.com
- Eric P Israel eisrael@DanningGill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- Razmig Izakelian razmigizakelian@quinnemanuel.com
- Evan M Jones ejones@omm.com, ejones@omm.com
- Alan H Katz akatz@lockelord.com
- John C Keith john.keith@doj.ca.gov

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- Jeannie Kim jekim@sheppardmullin.com, dgatmen@sheppardmullin.com
- Anna Landa Anna@MarguliesFaithlaw.com,
Helen@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Angela@MarguliesFaithLaw.com
- Mitchell J Langberg mlangberg@bhfs.com, dcrudup@bhfs.com
- Maxim B Litvak mlitvak@pszjlaw.com
- Vincent T Martinez llimone@twitchellandrice.com, smccomish@twitchellandrice.com
- Michael Arthur McConnell (TR) Michael.mcconnell@kellyhart.com
- Brian M Metcalf bmetcalf@omm.com, brian-metcalf-9774@ecf.pacerpro.com
- Monserrat Morales Monsi@MarguliesFaithLaw.com,
Vicky@MarguliesFaithLaw.com; Helen@marguliesfaithlaw.com; Angela@MarguliesFaithlaw.com
- Alan I Nahmias anahmias@mbnlawyers.com, jdale@mbnlawyers.com
- Jerry Namba nambaepiq@earthlink.net, atty_namba@bluestylus.com
- David L Osias dosias@allenmatkins.com,
bcrfilings@allenmatkins.com, kdemorest@allenmatkins.com, csandoval@allenmatkins.com
- Darren L Patrick dpatrik@omm.com, darren-patrick-
1373@ecf.pacerpro.com; sindelicato@omm.com; ejones@omm.com
- Jeffrey N Pomerantz jpomerantz@pszjlaw.com
- Benjamin P Pugh bpugh@ecg.law, mhamburger@ecg.law; calendar@ecg.law
- Edward S Renwick erenwick@hanmor.com, iaguilar@hanmor.com
- J. Alexandra Rhim arhim@hrhlaw.com
- Todd C. Ringstad becky@ringstadlaw.com, arlene@ringstadlaw.com
- Mitchell E Rishe mitchell.rishe@doj.ca.gov
- George E Schulman GSchulman@DanningGill.Com,
danninggill@gmail.com; gschulman@ecf.inforuptcy.com
- Zev Shechtman zshechtman@DanningGill.com,
danninggill@gmail.com; zshechtman@ecf.inforuptcy.com
- Sonia Singh ssingh@DanningGill.com, danninggill@gmail.com, ssingh@ecf.inforuptcy.com
- Daniel A Solitro dsolitro@lockelord.com, ataylor2@lockelord.com
- Ross Spence ross@sdllaw.com, brittany@sdllaw.com; donna@sdllaw.com
- Christopher D Sullivan csullivan@diamondmccarthy.com,
mdomer@diamondmccarthy.com; kmartinez@diamondmccarthy.com; quentin.roberts@diamondmccarth
y.com; erika.shannon@diamondmccarthy.com; aiemee.low@diamondmccarthy.com
- Jennifer Taylor jtaylor@omm.com
- John N Tedford jtedford@DanningGill.com, danninggill@gmail.com; jtedford@ecf.inforuptcy.com
- Salina R Thomas bankruptcy@co.kern.ca.us
- Meagan S Tom meagan.tom@lockelord.com,
autodocket@lockelord.com; taylor.warren@lockelord.com; autodocketdev@lockelord.com
- Patricia B Tomasco pattytomasco@quinnemanuel.com,
barbarahowell@quinnemanuel.com; cristinagreen@quinnemanuel.com
- Fred Whitaker lshertzer@cwlawyers.com, spatlas@cwlawyers.com
- William E. Winfield wwinfeld@calattys.com, scuevas@calattys.com
- Richard Lee Wynne richard.wynne@hoganlovells.com,
tracy.southwell@hoganlovells.com; cindy.mitchell@hoganlovells.com
- Emily Young pacerteam@gardencitygroup.com,
rjacobs@ecf.epiqsystems.com; ECFInbox@epiqsystems.com
- David R Zaro dzaro@allenmatkins.com
- Aaron E de Leest adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com

2. SERVED BY UNITED STATES MAIL:

On (date) **September 21, 2020**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Jane A and John S Adams, Trustees
PO Box 264
Yorba Linda, CA 92885

Philip W Ganong
930 Truxtun Avenue, Suite 102
Bakersfield, CA 93301

Dellena M Ludwig
530 Vicky Lane
Placentia, CA 92870

Sylvia Boisseranc
300 W. Paseo De Cristobal
San Clemente, CA 92672

Sid J. Garabato
Epiq Corporate Restructuring, LLC
777 Third Avenue
12th Floor
New York, NY 10017

Jarrold Barclay Martin
McDowell Hetherington LLP
1001 Fannin Ste 2700
Houston, TX 77002

Buganko
930 Truxtun Avenue, Suite 102
Bakersfield, CA 93301

Sheryl P Giugliano
Diamond McCarthy LLP
295 Madison Avenue
27th Floor
New York, NY 10017

Kevin D. McCullough
Rochelle McCullough L.L.P.
325 N. St. Paul St., Ste. 4500
Dallas, TX 75201

Peter Calamari
Quinn Emanuel Urquhart & Sullivan
LLP
51 Madison Avenue 22nd floor
New York, NY 10010

Steven William Golden
Pachulski Stang Ziehl & Jones LLP
780 Third Avenue
34th Floor
New York
New York, NY 10017

Darren L. Patrick
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071

Daniel L. Cantor
O'Melveny & Myers LLP
7 Times Square
New York, NY 10011

Mitchell Elliott Rishe
California Department of Justice
Office of the Attorney General
300 S. Spring Street, Suite 1702
Los Angeles, CA 90013

Carolyn V Carollo
Snow Spence Green LLP
2929 Allen Parkway
Suite 2800
Houston, TX 77019

Ira S. Greene
Squadron, Ellenoff, Plesent, et al
551 Fifth Ave.
New York, NY 10176

Vadim J. Rubinstein
Loeb & Loeb LLP
345 Park Avenue
New York, NY 10154-0037

Carolyn Virginia Carollo
Snow Spence Green, LLP
2929 Allen Parkway, Ste. 2800
Houston, TX 77019

Grobstein Teeple LLP
6300 Canoga Avenue Suite 1500W
Woodland Hills, CA 91367

William R. Spence
Snow Spence Green LLP
2929 Allen Pkwy., Suite 2800
Houston, TX 77019-2125

Allan B. Diamond
Diamond McCarthy, LLP
909 Fannin, Ste. 3700
Houston, TX 77010

Elizabeth Mary Guffy
2800 JP Morgan Chase Tower
600 Travis
Houston, TX 77002

Ruth Stoner Muzzin
Friedman & Springer Water LLP
350 Sansome Street
Suite 210
San Francisco, CA 94104

Fauver, Large, Archbald & Spray, LLP
820 State Street
Fourth Floor
Santa Barbara, CA 93101

HVI Cat Canyon, Inc.
c/o Capitol Corporate Services, Inc.
36 S. 18th Avenue
Suite D
Brighton, CO 80601

Gary Svirsky
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036

Robert J. Feinstein
Pachulski Stang Ziehl & Jones LLP
780 Third Avenue, 34th Floor
New York, NY 10017

Brian L. Holman
Musick, Peeler & Garrett LLP
624 S. Grand Avenue, Suite 2000
Los Angeles, CA 90017

Patricia Tomasco
Quinn Emanuel Urquhart & Sullivan
711 Louisiana St.
Suite 500
Houston, TX 77002

Samantha M. Indelicato
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036

Shannon Smith Thomas
Rochelle McCullough, LLP
325 N. Saint Paul St., Ste. 4500
Dallas, TX 75201

Patricia B. Tomasco
Quinn Emanuel Urquhart & Sullivan
711 Louisiana St.
Suite 500
Houston, TX 77002

Eric M. Van Horn
Spencer Fane LLP
2200 Ross Avenue
Suite 4800 West
Dallas, TX 75201

Rob Thomson
1920 Wilbur Ave
San Diego, CA 92109

Michael D. Warner
Cole Schotz P.C.
1700 City Center Tower II
301 Commerce St.
Fort Worth, TX 76102

Bruce W Wagner
Twitchell and Rice, LLP
215 North Lincoln St
PO Box 520
Santa Maria, CA 93456

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **September 21, 2020**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

San Fernando Valley Division
Honorable Martin R. Barash
U.S. Bankruptcy Court
21041 Burbank Blvd, Suite 342
Woodland Hills, CA 91367

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Irma Aguilar

Date

Printed Name

/s/ Irma Aguilar

Signature